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Counsel for Pioneer Electronics, Inc.

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
(Richmond Division)**

IN RE:)	
)	
CIRCUIT CITY STORES, INC.)	Case No. 08-35653 (KRH)
)	(Chapter 11)
)	
Debtor.)	Jointly Administered

**NOTICE OF MOTION OF WILLIAM DANIEL SULLIVAN
FOR ADMISSION OF MAX NEWMAN PRO HAC VICE**

PLEASE TAKE NOTICE THAT William Daniel Sullivan, counsel for Pioneer Electronics, Inc., filed (on November 10, 2009) the above-described motion, a copy of which (together with the proposed order thereupon) is annexed hereto.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

If you do not wish the Court to grant the motion, or if you want the Court to consider your views on the motion, you or your attorney **must**:

- **ON OR BEFORE SEVEN (7) DAYS BEFORE THE SCHEDULED HEARING DATE STATED BELOW**, i.e. on or before Thursday, January 21, 2010, file with the Court a written response with supporting memorandum as required by Local Bankruptcy Rule 9013-1(H). The address of the Court for filing is:

Clerk
United States Bankruptcy Court
Eastern District of Virginia
701 East Broad Street
Suite 4000
Richmond, Virginia 23219

Unless a written response and supporting memorandum are filed on or before Thursday, January 21, 2010, the Court may deem any opposition waived, treat the motion as conceded, and issue an order granting the requested relief without further notice or hearing. If you mail your response to the Court for filing, you must mail it early enough so the Court will **receive it by 4:00 p.m.** on or before the date stated above. You must also provide a copy to the persons listed below so that these persons **receive** your response on or before the date stated above.

- **Attend the hearing scheduled to be held on January 28, 2010, at 10:00 a.m. in Courtroom 5000, 701 East Broad Street, Richmond VA 23219.**
- Provide a copy of any written response to the following persons:

William Daniel Sullivan, Esquire
BUTZEL LONG TIGHE PATTON, PLLC
1747 Pennsylvania Avenue, N.W., Suite 300
Washington, D.C. 20007

Office of the United States Trustee
701 E. Broad St. Suite 4304
Richmond, Virginia 23219

MCGUIREWOODS LLP
One James Center
901 East Cary Street
Richmond, VA 23219
ATTN: Dion W. Hayes
ATTN: Douglas M. Foley

If you or your attorney do not take these steps, the Court may decide that you do not oppose the motion and may enter an order granting the motion.

RESPECTFULLY SUBMITTED,

/s/ William Daniel Sullivan
William Daniel Sullivan, Esquire (VSB # 17493)
Butzel Long Tighe Patton, PLLC

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Counsel for Pioneer Electronics, Inc.

CERTIFICATE OF SERVICE

I hereby certify that true copies of the foregoing Notice, together with the annexed motion and proposed order, were mailed, first-class postage prepaid, this 7th day of January 2010 to the Office of the United States Trustee, 600 East Main Street, Suite 301, Richmond, VA 23219, and served on all other parties entitled to notice hereof by electronic copies hereof delivered through the Court's ECF system..

/s/ William Daniel Sullivan
William Daniel Sullivan

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
(Richmond Division)**

-----X
: Chapter 11
In re: :
: Case No. 08-35653 (KRH)
CIRCUIT CITY STORES, INC., *et al.*, :
: Debtors. :
: :
: :
-----X

MOTION TO ADMIT COUNSEL PRO HAC VICE

NOW COMES William Daniel Sullivan, counsel for Pioneer Electronics, Inc. (“Pioneer”) in this case and a member of the bar of this Court, and moves, pursuant to Local Rule 2090-1(E)(2), for the admission *pro hac vice* of Max Newman of Butzel Long, a professional corporation, Stoneridge West, 41000 Woodward, Bloomfield Hills, Michigan 48304, in support thereof, Movant states as follows:

1. Max J. Newman graduated for the University of Michigan Law School in 1994 and was admitted to practice in the State of Michigan in 1994. Mr. Newman is a member in good standing of the State Bar of Michigan. Mr. Newman is admitted to practice in the Eastern District of Michigan and Western District of Michigan and has been admitted either generally or *pro hac vice* for cases in Delaware, the Southern District of New York, the Eastern District of Texas, the Northern District of Texas, the Northern District of Ohio, and the Northern District of Indiana.

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2. Mr. Newman's admittance to practice law has never been revoked and he is not the subject of any disciplinary proceedings.

3. Pursuant to Local Bankruptcy Rule 9013-1(G), and because there are no novel issues of law presented in this motion, Movant requests that the requirement that all motions be accompanied by a written memorandum of law be waived.

4. No previous request for relief sought herein has been made to this Court or any other court.

WHEREFORE, the Movant requests this Court enter an order admitting Max J. Newman of the firm Butzel Long, *pro hac vice* to the bar of this Court for the conduct of this case.

Respectfully submitted,

PIONEER ELECTRONICS, INC.

/s/ William Daniel Sullivan
By: William Daniel Sullivan
Counsel

William Daniel Sullivan (VSB #17493)
Butzel Long Tighe Patton, PLLC
1747 Pennsylvania Ave., N.W. Suite 300
Washington, D.C. 20007
Tel: 202-454-2850
Fax: 202-454-2805
Counsel for Pioneer Electronics, Inc.

Certificate of Service

I hereby certify that true copies of the foregoing motion and the accompanying proposed order served on all other parties entitled to notice hereof by electronic copies hereof delivered through the Court's ECF system. In view of the timing of the requested relief (for a telephone hearing on November 12), no US mail copy has been served upon the Office of the United States Trustee.

/s/ William Daniel Sullivan

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
(Richmond Division)**

-----X
In re: : Chapter 11
: :
CIRCUIT CITY STORES, INC., *et al.*, : Case No. 08-35653 (KRH)
: :
Debtors. :
: :
-----X

ORDER APPROVING ADMISSION PRO HAC VICE OF MAX J. NEWMAN

This matter comes before the Court upon the Motion of William Daniel Sullivan, counsel for Pioneer Electronics, Inc. herein, requesting entry of an order approving the admission *pro hac vice* of Max J. Newman of the firm of Butzel Long, a professional corporation, Stoneridge West, 41000 Woodward, Bloomfield Hills, Michigan 48304, to represent the interests of Pioneer Electronics, Inc. Based upon the representations set forth in the Motion, and finding it otherwise proper, the Court

ORDERS, that Max J. Newman, and hereby is, ADMITTED *pro hac vice* to practice before the Court in these proceedings.

Dated: November ____, 2009

Hon. Kevin R. Huennekens
United States Bankruptcy Judge

Entered: _____

Certificate in Accordance with Local Rule 9022-1(C)

Pursuant to Local Rule 9022-1(C), I hereby certify that the foregoing proposed order has been served on all necessary parties.

/s/ William Daniel Sullivan